

VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF NORFOLK

PEARL Y. GLASGOW,

Plaintiff,

Case No. CL16-9080
PLAINTIFF DEMANDS A TRIAL BY JURY

v.

WAL-MART STORES EAST, LP,

Defendant.

Serve: Wal-Mart Stores East, LP
c/o CT Corporation System, Registered Agent
4701 Cox Road, Suite 285
Glen Allen, Virginia 23060

COMPLAINT

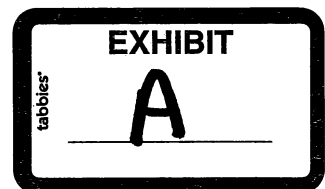
TAKE NOTICE that the undersigned hereby moves the Circuit Court for the City of Norfolk, at the courthouse thereof, for a judgment and award against you for the sum of SEVENTY-FOUR THOUSAND DOLLARS (\$74,000.00), together with pre-judgment interest and costs for the following, to wit:

1. That on or about November 7, 2014, the plaintiff, PEARL GLASGOW, was a business invitee at the defendants' premises located at 2021 Lynnhaven Parkway, City of Virginia Beach, Virginia.

2. That at all times mentioned herein, the defendant, WAL-MART STORES EAST, LP, owned, operated, maintained, and controlled the premises located at 2021 Lynnhaven Parkway, City of Virginia Beach, Virginia.

3. That at all times mentioned herein, the defendant, WAL-MART STORES EAST, LP, regularly conducts business activity in the City of Norfolk, Virginia.

4. That at all times mentioned herein, the defendant owed a duty to the public and its



business invitees to maintain the premises in a safe and reasonable manner, and to warn of any unsafe condition which the defendant knew, or should have known, existed on the property.

5. Notwithstanding the aforementioned duty, the defendant, by and through its agents and employees, negligently owned, operated, and maintained the property in an unsafe condition causing the plaintiff to fall and receive serious and permanent injuries.

6. Notwithstanding the aforementioned negligence, the defendant, by and through its agents and employees, negligently failed to warn the plaintiff of an unsafe condition which the defendant knew, or should have known, existed on the property at the time of the plaintiff's accident.

7. Notwithstanding the aforementioned negligence, the defendant negligently owned, operated, and maintained the property in violation of applicable building codes, occupancy codes, maintenance codes, and statutes constituting negligence per se.

8. As a direct and proximate result of the defendants' negligence and recklessness, the plaintiff, PEARL GLASGOW, fell causing her to sustain serious and permanent injuries.

9. That these injuries to the plaintiff have caused and will in the future cause great physical pain, mental anguish, and inconvenience; have required the plaintiff to expend large sums of money for medical expenses and may reasonably require medical expenses in the future and have resulted in lost earnings for being unable to work.

10. As a direct and proximate result of the plaintiff's injuries, the plaintiff may reasonably be expected to sustain permanent injuries in the future, and may reasonably be expected to sustain loss of earnings and lessening of earning capacity in the future, and the injuries may reasonably be expected to result in disfigurement and deformity with associated humiliation and embarrassment.

WHEREFORE, plaintiff moves the Court for a judgment and award against you for the sum of SEVENTY-FOUR THOUSAND DOLLARS (\$74,000.00), together with pre-judgment interest and costs aforesaid.

PEARL Y. GLASGOW

By 

Of Counsel

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